

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
ALEXANDRIA DIVISION**

ROBERT MORGAN ET AL

CIVIL ACTION NO. 1:21-CV-00531

VERSUS

JUDGE DRELL

DEEERE & CO INC ET AL

MAGISTRATE JUDGE PEREZ-MONTES

PLAN OF WORK

On September 13, 2021, the following individuals participated in a meeting by e-mail during which this Plan of Work was formulated:

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Part A

Based on the information now reasonably available, the parties have agreed upon the following:

October 15, 2021	Date disclosures under Fed. R. Civ. P. 26(a) will be made.
December 1, 2021	Final date for plaintiff to identify experts, if any.
January 15, 2022	Final date for defendants to identify experts.
March 15, 2022	Final date for adding parties.
April 1, 2022	Final date for plaintiff to produce reports of experts.

April 15, 2022	Final date for defendants to produce reports of experts.
May 15, 2022	Final date for filing amended pleadings.
May 31, 2022	Final date for depositions of plaintiff's experts.
June 30, 2022	Final dates for depositions of defendant's experts
July 31, 2022	Deadline for completion of discovery.
August 31, 2022	Final date for filing dispositive motions.

Part B

The following areas of disagreement, issues, or problems, have arisen regarding the information set forth in Section A and/or the participation of counsel/unrepresented parties in the Plan of Work process: **None.**

Respectfully submitted,

s/ Fred A. Pharis

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